

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,) CASE NO.: 4:19 CR 056
)
Plaintiff,) JUDGE BENITA Y. PEARSON
)
v.)
)
RYAN SHERIDAN, *et al.*,)
)
Defendants.) **DEFENDANT JENNIFER SHERIDAN'S**
) **MOTION TO CONTINUE SENTENCING**
)

Now comes Defendant, Jennifer Sheridan, by and through counsel, and requests the Court to continue her sentencing hearing, currently set for Tuesday, January 21, 2020, to allow her to put legal guardianship of her minor children in place prior to serving her sentence. Further reasons for the requested continuance are contained in the attached Brief in Support incorporated herein by reference.

Respectfully submitted,

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BRIEF IN SUPPORT

Defendant Jennifer Sheridan (“Ms. Sheridan”) and codefendant Ryan Sheridan share two minor children, boys aged 10 and 12 (“the minor children”) (see final PSI report for further information). As the Court knows, Ryan Sheridan is still incarcerated and has been for several months during the pendency of this case. Both Ms. Sheridan and Ryan Sheridan will be sentenced to federal incarceration as terms of their plea agreements with the U.S. Attorney’s Office. Despite numerous efforts on the part of Ms. Sheridan, and due to many unique factors addressed below, the legal guardianship, protection and care for the minor children is still unresolved.

A. The Family Situation

For the Court’s perspective, a brief overview of the current family situation of Ms. Sheridan will be provided here. As provided in the PSI report, Ms. Sheridan has a limited number of family members. Her mother is legally blind, suffers from several health issues, and Ms. Sheridan has a very strained relationship with her. Ms. Sheridan does not know her father and has no relationship with him. Ms. Sheridan has a younger half-sister with a young family of her own. Unfortunately, Ms. Sheridan’s half-sister’s family and financial situation does not allow for her to serve as a guardian for the minor children at this time. Ms. Sheridan has no other blood relatives who could serve as guardians of the minor children.

As reported in the PSI, Ms. Sheridan suffered physical abuse at the hands of Mr. Sheridan during their marriage, and threats, coercion, and verbal abuse during her employment with Ryan Sheridan’s company in this case, Braking Point. Despite this, Ms. Sheridan has tried to work with Mr. Sheridan’s family to find a solution to the care and custody of the minor children. Ms. Sheridan has asked Mr. Sheridan’s mother to serve as guardian of the children, but she has not

agreed to this and Mr. Sheridan is vehemently opposed to this. Only recently, within the past 5 days, has Ms. Sheridan received an agreement by her ex-brother-in-law, Mr. Sheridan's brother, to serve as a guardian of the minor children during her incarceration.

Ms. Sheridan has a 22 year old daughter but she is currently serving in the military in Iraq and will not be home until August of 2020. Ms. Sheridan's other daughter is a freshman at the Ohio State University. Neither is currently in a position to serve as guardian for the minor children.

B. Living Situation

Mr. Sheridan's mother and wife both live in properties that are subject to forfeiture to the U.S. Department of Justice. While Ms. Sheridan lives in a property that is not subject to forfeiture, it was owned by Ryan Sheridan and recently transferred into his current wife's name. The unstable nature of these living situations has complicated Ms. Sheridan's attempts to find a guardian for the minor children. A guardian must have a fixed and stable address to be considered for guardianship. Ms. Sheridan's own living situation (and that of the minor children) is tenuous and at the mercy of Mr. Sheridan and his wife. Mr. Sheridan's brother lives in the Columbus area – which is a different school district. If he serves as guardian, the minor children would need to transfer schools in the middle of the school year.

C. Ryan Sheridan Situation

Ms. Sheridan has made several attempts to reach an agreement with Mr. Sheridan regarding the guardianship of their minor children as they currently have a shared parenting order. However, because Mr. Sheridan is incarcerated, communication on this has been difficult. He cancelled a telephone conference with his attorney, Ms. Sheridan and undersigned counsel. He has refused to speak to Ms. Sheridan by telephone, instead relaying messages through the

children. Additionally, Mr. Sheridan has not been agreeable to any solution other than his wife taking custody of the minor children. However, she is not a blood relative and her living situation is unknown. Mr. Sheridan has shown little interest in the well-being of his minor children while he and Ms. Sheridan are incarcerated. This has complicated Ms. Sheridan's attempts to resolve the issues.

D. The Minor Children

The minor children have been through a lot of adversity during the past year. Their father has been indicted, incarcerated, and will continue to be for several years. Their mother is also going to be incarcerated. Additionally, the children have some mental health issues that are concerning and the potential of going into foster care could be very detrimental to them. It is respectfully submitted to the Court that the need for the minor children to be placed with a family member is extremely important for their well-being.

E. The Current Situation

Ms. Sheridan has desperately been trying to get a guardian in place for the minor children since her guilty plea in this case. Ms. Sheridan took the Court's words to her seriously, to "not wait" in trying to address this issue. However, she has received no cooperation from Mr. Sheridan, his mother (the grandmother of the minor children), or anyone else to date. Additionally, the uncertainty of Mr. Sheridan's family members' living situations has complicated matters. Ms. Sheridan hoped to have an action filed to appoint a guardian by now, but only recently received the agreement of her ex-brother-in-law to serve as the guardian.

Ms. Sheridan asks the Court to continue her sentencing hearing until late June or in July of this year. This would allow the minor children to complete their school year, which ends in early June. This would also allow her ex-brother-in-law to apply for guardianship of the minor

children. If he is appointed guardian, the minor children will have to move to Columbus and into a new school district.

F. Conclusion

Ms. Sheridan knows that she will have to serve her sentence and does not seek to delay the inevitable. She only seeks to gain some security for her minor children and to put them in the best situation possible before she serves her sentence. This situation has been complicated by the above-listed factors. Ms. Sheridan respectfully requests this additional time to get her minor children's best interests in order.

Respectfully submitted,

/s/ Paul M. Shipp

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on January 14, 2020, a copy of the foregoing was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Paul M. Shipp

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